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**From:** Roger Bernstein <rbernstein@rjblaw.com>  
**Sent:** Wednesday, July 20, 2022 3:32 PM  
**To:** Williams, William A.  
**Cc:** Allen, Angela M.; Pelanek, Laura E.  
**Subject:** RE: In re Firestar Diamond Inc. - Outstanding Discovery & Requested Follow-Up

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Bill,

I have gone over each line item with my client today. I will be able to provide more information and documents by the end of the week. Any statements that have to be obtained from banks will take longer.

Roger

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**From:** Williams, William A. <WWilliams@jenner.com>  
**Sent:** Tuesday, July 19, 2022 5:13 PM  
**To:** Roger Bernstein <rbernstein@rjblaw.com>  
**Cc:** Allen, Angela M. <AAllen@jenner.com>; Pelanek, Laura E. <LPelanek@jenner.com>  
**Subject:** RE: In re Firestar Diamond Inc. - Outstanding Discovery & Requested Follow-Up

Roger,

Following up on my below email, the Trustee is concerned by Ms. Javeri's failure to comply with his long-outstanding discovery requests.

As you know, on March 7, 2022 The Trustee served Ms. Javeri with his initial set of document requests, which seek *inter alia*:

- All bank statements (including copies of checks) for all bank accounts in which Ms. Javeri has or had any interest, or for which she is or was an authorized signatory (along with a complete listing of all such accounts)(RFP 1, 2);
- All balance sheets, cash flow statements, or similar financial statements for Ms. Javeri (RFP 3);
- All federal or state tax returns for Ms. Javeri (RFP 4);
- All documents and communications related to all real property in which Ms. Javeri has or had any interest (and a complete listing of any such real property) (RFP 5, 6);

- All documents and communications related to any personal property with a value in excess of \$250,000 in which Ms. Javeri has or had any interest (and a complete listing of any such personal property) (RFP 7, 8);
- All insurance policies and appraisals concerning Ms. Javeri's real property, or any personal property with a value in excess of \$250,000 (RFP 9, 10);
- A complete listing of all entities in which Ms. Javeri has or had any ownership or beneficial interest, whether direct or indirect, or for which she served as an officer, director, partner, manager, employee, or other representative capacity. (RFP 12);
- All documents and communications relating to any trust in which Ms. Javeri has or had an interest as settlor or beneficiary or as a trustee, investment advisor, protector, or other fiduciary (RFP 13, 14);
- All documents and communications related to all debts or liabilities owed to Ms. Javeri (RFP 17);
- All documents and communications related to any loans, financings, or extensions of credit Ms. Javeri has received from any of the Relevant Persons or any of the Relevant Entities (RFP 18); and
- All documents and communications related to any transfers assets of a value in excess of \$250,000 between you and any of the Relevant Persons or Relevant Entities (and a complete listing of all such transfers) (RFP 19, 20).

Although the original deadline for Ms. Javeri to respond was April 4, 2022, the Trustee agreed to extend her deadline to May 18, 2022 in connection with the first stipulation partially staying the attachment proceedings. (Dkt. 122, paragraph 9).

On May 19, 2022—one day after the deadline set by the court in the stipulation—you sent the Trustee an informal response to the document requests, and on May 19 and 20, produced a handful of bank statements, tax returns, and apartment-related expense documentation. In your May 19 email, you indicated that additional responsive documents would be forthcoming.

On June 23, 2022, after the Trustee still had not received any further productions from Ms. Javeri, we sent you the below email identifying numerous other responsive bank account statements and related materials that Ms. Javeri has not produced, but otherwise reserving all rights as to the full extent of the Trustee's discovery requests. You did not respond to that email and Ms. Javeri has not produced anything further since May 20, 2022.

It has now been nearly five months since the Trustee issued the document requests, and more than two months since the May 18 deadline set by the court. The Trustee has afforded Ms. Javeri ample opportunity to cure her default and to meet and confer with the Trustee regarding the deficiencies in her productions. If Ms. Javeri does not complete her production of all responsive materials by July 22, 2022, the Trustee intends to seek appropriate relief. All of the Trustee's rights and remedies are reserved in full.

Regards,  
Bill

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**From:** Williams, William A.  
**Sent:** Thursday, June 23, 2022 2:59 PM  
**To:** Roger Bernstein <[rbernstein@rjblaw.com](mailto:rbernstein@rjblaw.com)>  
**Cc:** Allen, Angela M. <[AAllen@jenner.com](mailto:AAllen@jenner.com)>; Pelanek, Laura E. <[LPelanek@jenner.com](mailto:LPelanek@jenner.com)>  
**Subject:** In re Firestar Diamond Inc. - Outstanding Discovery & Requested Follow-Up

Roger,

Based on our review of Ms. Javeri's productions to date in response to the Trustee's Initial Requests for Production, a significant amount of the requested materials remain outstanding.

Although the Trustee reserves all rights as to the full extent of his discovery requests, in the interests of time, the Trustee has compiled the below list of targeted follow-up requests. The first table below contains a list of responsive bank statements and related documentation that has not been produced to date. The second table below contains requests for additional documents and information concerning specific transactions and other items reflected in the bank statements produced to date.

Can you please review these items with your client and produce these materials by next Friday, July 1, 2022?

I am available to discuss, if needed.

Thank you,  
Bill

Financial Institution	Account No.	Document
Wells Fargo	x6751	Confirmation of account opening. All statements prior to May 2021, June 2021, November 2021
Wells Fargo	x4728	Confirmation that account was opened in May 2018, statements
Wells Fargo	x9847	Account opening and closing documentation
Wells Fargo	x7096	Account opening and closing documentation
TD	x3636	Statements
HSBC	x3742	Account opening and closing documentation
HSBC	x8897	Account opening and closing documentation
HSBC	x7298	Account opening and closing documentation
HSBC	x9743	Account opening and closing documentation
HSBC	x9647	Account opening and closing documentation
Chase	x7198	Statements
Chase	x3783	Statements
Chase	x5052	Account opening and closing documentation
Chase	x7938	Account opening and closing documentation
Chase	x8956	Account closing documentation. All available
Chase	x7016	Account closing documentation
Chase	x8846	Account opening and closing documentation. Statements from April 2021
Chase	x2331	Account closing documentation
Chase	x7096	Account opening and closing documentation. Documentation
Citibank	x5532	Account opening and closing documentation
Citibank	x5057	Account opening and closing documentation
Citibank	x2945	Account opening and closing documentation
Citibank	x5928	Account opening and closing documentation
FineMark	x9351	Account opening and closing documentation
Santander	Unknown	Account opening and closing documentation

Financial Institution	Account No.	Requested Follow-Up
Wells Fargo	x4728	Explanation of and any other documents concerning \$10,000 transfer into V

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Wells Fargo	x4728	Explanation of and any other documents concerning \$30,000 transfer into V
Wells Fargo	x4728	Explanation of and any other documents concerning \$35,000 transfer into V
Wells Fargo	x4728	Explanation of and any other documents concerning \$30,000 transfer into V
Wells Fargo	x4728	Explanation of check detail for #102 for \$26,812.26 from "J
HSBC	x8897	Explanation of and check detail for #0102 and #0101 for \$10,000 and \$
Chase	x3783	Explanation and any other documents concerning \$26,322.39 withdraw
Chase	Safety deposit boxes	Explanation of and any other documents concerning Ms. Javeri's safety depo of their contents, estimated value, and curren

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## William A Williams

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